## RCRA HISTORY

| 1976                                 | The Resource Conservation and Recovery Act (RCRA) is enacted.  |
|--------------------------------------|--|
| 1 1/1 4/80<br>through<br>0 4/1 3/8 4 | The Department of Energy (DOE) takes position that its Atomic Energy Administration (AEA) facilities are categorically exempt from RCRA. This position is first articulated by DOE Asst. General Counsel, James Rogers on 11/14/80 and continued until DOE lost the LEAF case on 4/13/84.  |
| 11/14/80                             | Initial RCRA regulations become effective; S3010 "Notifications of Hazardous Waste Activity" (filed Summer, 1980) and Part A Permit Applications are filed by DOE as required for interim status. (Note: Rockwell submitted to DOE a Part A Permit Application which included mixed waste. However DOE submitted the Part A Permit Application to EPA without mixed waste included.) |
| 06/17/81                             | The Environmental Protection Agency (EPA) notifies DOE that the 11/19/80 Part A Permit Application is incomplete.  |
| 07/13/81                             | Rockwell provides amended Form 3 to DOE.   |
| 07/21/81                             | DOE informs EPA that radioactive wastes are excluded from RCRA and that it wished to withdraw its Part A Permit Application but that it wanted to be "included in the RCRA record system as a small quantity generator."   |
| 12/04/81                             | DOE, Albuquerque Operation (ALO) provides definition of "Radioactive Waste" as a means to distinguish mixed waste from pure hazardous waste.   |
| 03/23/82                             | DOE, ALO distributes DOE, Headquarters (HQ) proposed order 5480. This proposed order indicated low-level mixed waste will have both RCRA and radioactive requirements applied.   |
| 04/27/82                             | DOE, ALO indicates EPA Regional Office not accepting DOE position.   |
| 06/07/83                             | Proposed AL 5480.2 is in direct conflict with 03/23/82 DOE, HQ 5480.   |
| 08/22/83                             | DOE resubmits a Part A Permit Application since DOE no longer believes it is a "small quantity generator."   |
| 02/22/84                             | EPA/DOE Memorandum of Understanding (MOU) for Hazardous Waste and Radioactive Mixed Waste Management. This MOU established a program comparable to RCRA's technical record keeping and reporting requirements but did not require DOE to comply with RCRA permitting or procedural requirements.   |
| 04/11/84                             | During meeting at the Rocky Flats Plant (RFP), EPA requests information on RFP waste handling and Part A.  |
| 04/13/84                             | LEAF case decided. DOE loses; Court holds that DOE's not categorically exempt from RCRA. EPA takes position that LEAF abrogates the MOU.   |

Rockwell and DOE provides three waste management documents to EPA. 04/24/84 DOE, ALO says "MOU will probably remain in effect." 05/04/84 07/23/84 Rockwell prepares three Part A Permit Applications for interim status; one for hazardous waste, one for non-process mixed wastes, one for process mixed wastes. Not submitted to EPA or the Colorado Department of Health (CDH). DOE. ALO says submit Part A Permit Application for hazardous wastes only and 09/19/84 recommends omitting certain facilities because they have mixed waste involved. DOE, ALO distributes DOE opinion that Transuranic (TRU) and By-product material will be 10/08/84 excluded from RCRA. 11/84 DOE, HQ legal opinion - defining By-product waste. CDH authorized to implement the basic RCRA program. 11/02/84 12/12/84 Draft definition of By-product material issued by DOE. DOE, HQ notified Rockwell that EPA will require a RCRA Part B Permit Application in 12/84 FY'86. DOE, ALO states that it is permissible to include mixed waste streams in Part A Permit 03/01/85 Application, as long as they are identified as "candidate mixed waste." 04/18/85 CDH notified RFP that Part B Permit Application is due on 11/01/85. Rockwell and DOE submitted two revised Part A Permit Applications to CDH and EPA one 05/31/85 for hazardous wastes and one for "candidate mixed waste." The Part A Permit Application for candidate mixed waste was submitted unsigned, at the request of DOE. 07/25/85 DOE, HQ states that only radioactive mixed streams "clearly subject to RCRA jurisdiction" should be included in RCRA Permit Application. Rockwell and DOE submit Part A and Part B Permit Applications to CDH. These 11/01/85 applications included certain hazardous wastes, but do not include radioactive mixed waste streams or units. 11/08/85 Rockwell and DOE submit Part A and Part B Permit Applications to EPA. These applications included handling certain radioactive mixed wastes. CDH sends "Notice of Deficiency" (NOD) letter to DOE and Rockwell because 11/01/85 11/20/85 Permit Applications failed to include radioactive mixed waste. Letter gave RFP until 12/03/85 to provide mixed waste data or a "Public Notice of Intent to Deny a Permit" (NOID) would be issued. 12/16/85 CDH issues NOID because 11/01/85 Permit Applications failed to include radioactive mixed waste. 07/31/86 DOE enters a Compliance Agreement with CDH and EPA for the regulation of hazardous and low-level mixed waste. This agreement requires that RFP comply with 6 CCR 1007-3

interim status requirements, and submit a Part B Permit Application for hazardous and low-level mixed waste by 11/28/86. The agreement also required waste stream identification, site characterization and corrective action, closure and post-closure care plans, and a specific schedule for closure plans for the solar ponds. This agreement excludes TRU-mixed waste from its coverage.

- 1 1/0 5/86 Rockwell and DOE submit a request for change to interim status to add two pondcrete and saltcrete storage areas (750 Pad and Bldg. 964). CDH approves this request on 1/29/87 but specifies that they have no intent to permit these additional storage areas.
- 1 1/07/86 EPA pursuant to 42 U.S.C. 6926 authorized CDH to regulate the hazardous component of radioactive mixed waste.
- 1 1/28/86 Rockwell and DOE submit Part A and Part B Permit Applications (Revision 0) to CDH as required by the 1986 Compliance Agreement. These applications included both hazardous waste and low-level mixed waste.
- By final rule (10 C.F.R. 962) dated 05/01/87, (52 F.R. 15937-40) DOE interprets the term "by-product material", as defined in the Atomic Energy Act of 1954 as amended and used in RCRA. The effect of this final rule at the RFP, was to include within the coverage of RCRA those wastes categorized as TRU mixed wastes. These wastes contain greater than 100 nanocuries per gram of transuranium elements as well as hazardous components.
- O6/09/87 Rockwell submits revised Part A Permit Application to DOE, at the request of CDH, which removes Bldg. 995 Sewage Treatment Plant (STP) and adds more cargo containers. Not submitted to CDH by DOE until 11/87 (see below) so that additional changes could be included.
- 07/17/87 CDH requests DOE to submit a Part B Permit Application for TRU mixed wastes by 07/01/88, and indicated that failure to furnish a Part B Permit Application could result in the termination of interim status for those units.
- O9/28/87 CDH issues NOD for Hazardous and Low-Level Mixed Waste Permit Application. Areas of deficiency noted were the Waste Analysis Plan, the Contingency Plan, lack of diagrams for container storage areas, and not providing tank information required by new 07/86 tank regulations (particularly secondary containment information).
- 10/09/87 DOE and Rockwell submit a Part A Permit Application (Revision 0) for TRU-mixed waste to CDH and EPA.
- 12/15/87 DOE and Rockwell submit revised Part A and B Permit Applications (Revision 1) for Hazardous and Low-Level Mixed Waste. These applications included revisions in response to the 09/28/87 NOD from CDH as well as deleting many storage areas and dumpsters (which became 90-day areas) and Bldg. 995 STP, and added more cargo containers.
- DOE and Pockwell request a temporary change to interim status for moving freezing drums from Main Hazardous Waste Storage Area (Unit 1) to Bidg. 664 (Unit 20). CDH approves request (for 90-days only) on 02/29/88.
- 04/13/88 DOE and Rockwell submit corrected pages to CDH for Hazardous and Low-Level Mixed Waste Part A and B Permit Application (Revision 2). Changes include additional cargo

containers in Unit 1 and deletes reference to the Fluidized Bed Incinerator (FBI).

- DOE and Rockwell submit a Part A Permit Application (Revision 1) for TRU-mixed wastes to CDH. This application included a request for increased storage and treatment capacity and added and deleted several units. DOE sent a letter on 11/18/88 urging CDH to review and approve this submittal. CDH responded on 12/15/88 saying additional information and justification was needed, and that some of the requests were not valid under interim status. A DOE/Rockwell/EPA/CDH meeting followed on 01/10/89 and additional information and justification was provided to CDH on 03/01/89.
- 06/15/88 DOE and Rockwell submit letter to CDH requesting change to interim status for Revision 2 of Part A and B Permit Applications submitted 04/13/88.
- 07/01/88 DOE and Rockwell submit a revised Part A Permit Application and Part B Permit Application (Revision 0) for TRU-mixed waste.
- DOE and Rockwell submit to CDH documentation proposing Building 774 processes as totally enclosed treatment facilities and thereby exempt from RCRA regulations. CDH never responded and RFP did not pursue further.
- DOE and Rockwell submit a revised Part A Permit Application (Revision 3) for Hazardous and Low-Level Mixed Waste. This submittal followed a 07/25/88, meeting with CDH held to discuss interim status issues. The primary purpose of this submittal was to provide additional justification and explanation for the applications for interim status that had previously been made.
- 08/15/88 CDH issues "Notice of Completeness" (NOC) for Hazardous and Low-Level Mixed Waste Permit Application.
- EPA published a "clarification notice" which attempted to clarify requirements for facilities that treat, store, or dispose of radioactive mixed waste regarding the obtaining of "interim status." In states not authorized by EPA to administer the Federal Hazardous Waste Program in lieu of EPA, facilities were given to 03/23/89, to file a Part A Permit Application and qualify for interim status. Further, EPA's clarifying notice acknowledged the substantial "confusion and uncertainty" that has "surrounded the applicability of RCRA to hazardous wastes containing certain radioactive materials."
- 10/25/88 Rockwell submitted to DOE a revised Part A Permit Application for TRU-mixed waste requesting interim status for storage in eight ATMX railcars and in two new buildings near 904 Pad. The Permit Application was not submitted to CDH.
- 06/07/89 CDH serves DOE with Compliance Order 89-06-07-01 citing violations noted during CDH inspection conducted 06/88 through 01/89. Violations included inadequate groundwater monitoring, storage without interim status (particularly at Bldg. 964 and 904 Pad), and administrative problems.
- DOE, Rockwell and CDH enter into Settlement Agreement 89-07-10-01 in response to the 06/89 Compliance Order. In this agreement, DOE and Rockwell commit to submit a consolidated Part A Permit Application (to clarify interim status issues), and DOE commits to pay a sum of \$95,800.00. Exhibit A of the Settlement Agreement states for which units RFP has interim status and limits TRU-mixed waste capacity to 1,601 cubic yards.

- O8/09/89 CDH issues "Notice of Violation" (NOV) 89-08-09-01 stating that residues possessing hazardous waste characteristics or containing listed hazardous wastes are subject to Colorado Hazardous Waste Regulations if the residues are not in-process secondary materials. The NOV cited RFP for not submitting permit applications for mixed residues and not managing mixed residues in accordance with regulations, and directed RFP to come into compliance.
- DOE and Rockwell submit a consolidated Part A Permit Application which includes hazardous and low-level mixed, and TRU-mixed waste. This was done to satisfy the 07/14/89 Settlement Agreement and to clarify what units had interim status for what wastes. (Separate Part A Permit Application for low-level mixed and TRU-mixed waste continued to be used by Rockwell and DOE.)
- DOE and Rockwell request a temporary change to interim status to temporarily store hazardous gas cylinders at an alternate location during repairs of Bldg. 952 (Unit 23). CDH approves the request in a letter dated 08/25/89, for the period from 08/28/89 through 09/22/89.
- 09/19/89 Federal Facilities Compliance Agreement (FFCA) signed by DOE, EPA and CDH. The agreement required DOE to take actions to ensure identification, safe storage and minimization of Land Disposal Restricted (LDR) mixed waste.
- 10/04/89 Draft Permit Application for operation of some hazardous and low-level mixed storage units received from CDH. NOID received for remaining storage units and all treatment units included in Hazardous and Low-Level Mixed Permit Application.
- 10/06/89 DOE and Rockwell submit to CDH revised Part A Permit Application for TRU-mixed waste (Revision 2). Requests movement of Unit 63 from Bldg. 371 to Bldg. 776 to accommodate stripout to occur in Bldg. 371. (Request was withdrawn in 10/90.)
- 10/16/89 DOE and Rockwell submit to CDH two volumes of information describing the Supercompactor and Size-Reduction Facility (SARF) and TRU Waste Shredder (TWS), requesting a change to interim status. (Considered Revision 3 of Part A Permit Application for TRU-mixed waste).
- 10/31/89 DOE and EG&G Rocky Flats submit to CDH revised Part A Permit Application for hazardous and low-level mixed waste (Revision 4), reflecting change on operator only.
- 11/01/89 DOE and EG&G Rocky Flats submit revised Part A Permit Application for TRU-mixed waste (Revision 4), reflecting change in operator only.
- 11/03/89 Settlement Agreement Compliance Order 89-10-30-01 ["Residue Compliance Agreement" (RCA)] signed by DOE, EPA and CDH in response to the 08/09/89 NOV. The agreement defines residues, which residues are RCRA-regulated, and a series of deliverables geared to characterizing and inventorying residues. The final deliverable is the Mixed Residue Compliance Plan to be delivered 09/28/90.
- 11/21/89 DOE and EG&G Rocky Flats request CDH approval to move certain TRU-mixed wastes back to 90-day areas at Non-Destructive Assay (NDA) equipment for re-assaying. (CDH grants approval for six months on 12/11/89. DOE and EG&G Rocky Flats request a six-month extension on 07/20/90 which is granted on 09/04/90.)

- 12/18/89 DOE and Rockwell submit Facility Comments on CDH Draft Permit for hazardous and low-level mixed waste storage units.
- DOE and Rockwell submit revised Part A Permit Application for hazardous and low-level mixed waste (Revision 5) to request change to interim status for two new pondcrete/saltcrete reprocessing units (Units 34 and 35). CDH approves request on 04/05/90, but states there is no intention to permit these units and that interim status expires in 11/92. (The revised Part A Permit Application was signed by Rockwell at the end of year 1989 but not submitted until CY'90 after EG&G Rocky Flats became operating contractor. Revision 5.1 was prepared to include change in operator only, but was never submitted because Revision 6 became necessary a few months later.)
- 03/28/90 DOE and EG&G Rocky Flats submit to CDH revised Part B Permit Application for hazardous and low-level mixed waste (Revision 3) to address the 10/04/89 NOID.
- U.S. District Court partial judgement on the Sierra Club versus DOE and Rockwell citizen enforcement action concerning RCRA-regulated residues. The judgement finds that mixed residues are RCRA Subtitle C hazardous wastes and that RFP has burned and is storing RCRA Subtitle C hazardous wastes (mixed residues) without RCRA interim status or permit. The judgement comments that the 11/03/89 Residue Compliance Agreement is commendable, but states that it is indefinite and gives no deadlines for compliance.
- DOE and EG&G Rocky Flats submit to CDH revised Part A Permit Application for hazardous and low-level mixed waste (Revision 6) requesting a change to interim status for the Building 889 Baler and associated storage area. CDH grants conditional approval on 12/10/90.
- 08/17/90 DOE, EPA, and CDH sign the Environmental Restoration Interagency Agreement (IAG) to provide a procedural framework and schedule to address the investigation and remediation of environmental impacts resulting from past and present activities at RFP. The IAG consolidates the requirements of RCRA, CERCLA and the Colorado Hazardous Waste Act.
- DOE and EG&G Rocky Flats request a change to interim status to move Unit 1 drums to Building 664 (Unit 20) for Real-Time Radiography (RTR). CDH grants approval on 10/24/90.
- DOE and EG&G Rocky Flats request a temporary change to interim status to increase storage capacity of Unit 1 for non-radioactive hazardous waste oils. CDH never responded to request and request became unnecessary in 03/91 when non-rad hazardous oils were shipped offsite.
- 08/29/90 DOE and EG&G Rocky Flats submit to CDH a request for change to interim status to add blue dye to the solar ponds. (CDH approves request on 12/28/90.)
- 08/29/90 DOE and EG&G Rocky Flats request temporary change to interim status for storage of Building 884 (Unit 13) wastes in Tent #7 to allow for Unit 13 repairs (CDH approves request on 09/12/90).
- 09/28/90 DOE and EG&G Rocky Flats submit Residue Compliance Plan to CDH as the last deliverable

- of the Residue Compliance Agreement (RCA). This plan outlines how and when mixed residues at RFP will be brought into compliance with physical and administrative requirements of RCRA.
- DOE and EG&G Rocky Flats submit to CDH a request for change to interim status to allow operation of aerators and heater/soaker pipe at the solar ponds (CDH approves requests on 12/28/90; however only conditionally for aerators. EG&G Rocky Flats/DOE withdraw request for aerators on 08/06/91).
- 11/01/90 EG&G Rocky Flats submits to DOE a Permit Modification documentation for the Centralized Waste Storage Facility (CWSF). Permit Modification could not be submitted to CDH because Permit had not yet been issued.
- 11/14/90 EG&G Rocky Flats submits revised Part B Permit Application for TRU-mixed waste (Revision 1) to DOE. Includes Supercompactor and general updates. Never submitted to CDH.
- DOE and EG&G Rocky Flats submit to CDH a request for change to interim status to allow operation of portable evaporators at the solar ponds. CDH requests Interim Measure/Interim Remedial Action (IM/IRA) documentation instead of a change to interim status on 06/24/91. IM/IRA was submitted 7/3/91 and revised and resubmitted 8/20/91.
- 2/12/91 DOE and EG&G Rocky Flats submit to CDH a closure plan for Building 771 Incinerator as required by the Residue Compliance Plan.
- FFCA II signed by DOE and EPA to extend and expand original 09/19/89 FFCA. FFCA requires DOE to identify, provide safe storage, develop and implement treatment technologies, and minimize LDR waste with the goal to achieve compliance with LDR portions of RCRA.
- DOE and EG&G Rocky Flats submit to CDH revised Part A Permit Applications; Revision 7, for hazardous and low-level mixed waste and Revision 5, for TRU-mixed waste. The revised applications request change to interim status to operate certain NDA areas, add Unit 6, and correct several EPA codes.
- DOE and EG&G Rocky Flats submit to EPA and CDH revised Part A Permit Applications; Revision 8, for hazardous and low-level mixed waste and Revision 6, for TRU-mixed waste. The revised applications add the new Toxicity Characteristic Leaching Procedure (TCLP) EPA codes, and add the Size Reduction Facilities (Units 61 and 62) to the low-level application.
- 7/24/91 DOE and EG&G Rocky Flats submit to CDH the Preliminary Tank and Treatment Unit Report, as required by the Residue Compliance Plan.
- 07/26/91 EG&G Rocky Flats submits to DOE a request for change to interim status for Environmental Restoration (ER) waste storage and treatment facilities. DOE submits this request with the 08/12/91 Consolidated Part A Permit Application (see below).
- 7/31/91 CDH issues Compliance Order 91-07-31-0, the "Residue Compliance Order". The Order is based on the Residue Compliance Plan and establishes due dates for physical and administrative compliance for all mixed residues.

- 08/01/91 DOE and EG&G Rocky Flats submit to CDH a request for change to interim status to allow supercompaction of low-level mixed waste at the SARF (Unit 74). The request identifies changes to the 11/16/89 TRU-mixed waste SARF Part A Permit Application necessary in order to supercompact low-level mixed waste.
- DOE and EG&G Rocky Flats submit to CDH a revised consolidated Part A Permit Application (Revision 1). The hazardous and low-level and TRU-mixed waste Part A Permit Applications were consolidated as a result of continual findings of low-level mixed wastes being stored/treated in TRU-mixed waste units. CDH informally agreed with EG&G Rocky Flats that a consolidated Part A Permit Application would simplify many interim status problems. This revision of the consolidated Part A Permit Application combined Revision 8 of the hazardous and low-level mixed waste Part A Permit Application and Revision 6 of the TRU-mixed Part A Permit Application, and requested additional changes. These changes include the treatment of low-level mixed waste in Building 774, additional EPA codes for liquid waste treatment units, four new ER waste storage and treatment units, Building 776 baler, two oil/water separation units and several other clarifications.
- 9/12/91 DOE and EG&G Rocky Flats submit to CDH a request for change to interim status for the soaker hose at the solar ponds. CDH approves change on 9/12/91.
- 9/12/91 DOE, EG&G Rocky Flats, and CDH hold meeting to discuss status of various permitting actions. CDH requests additional information and justification for all previous requests for change to interim status. CDH also said that interim status for new TCLP codes was self implementing and stated that RFP must submit permit modifications for any new units, versus changes to interim status.
- 9/27/91 DOE and EG&G Rocky Flats submit to CDH standardized closure plans for mixed residue storage areas as required by the Residue Compliance Plan.
- 9/30/91 CDH issues Part B Operating Permit for nine hazardous and low-level mixed waste storage units. Permit becomes effective on 10/30/91.
- 10/28/91 DOE and EG&G Rocky Flats submit Permit Modification Request #1 to CDH, a Class II modification which included 12 seperate changes needed to ensure RFP compliance with the permit. Modification included changes to the contingency plan, waste analysis plan, and unit descriptions. Temporary authorization was requested and granted 10/31/91. Public comment meeting held 12/5/91. The Modification was approved by CDH on 4/30/92.
- 10/29/91 DOE and EG&G Rocky Flats submit to CDH mixed residues "Waste Analysis Plan" as required by the Residue Compliance Order.
- DOE and EG&G Rocky Flats submit Permit Modification Request #2 to CDH, a Class I modification which "cleaned up" many administrative errors in the permit.
- 11/26/91 DOE and EG&G Rocky Flats submit to CDH standardized closure plans for mixed residue tanks, as required by the Residue Compliance Order.
- 12/10/91 DOE and EG&G Rocky Flats submit a temporary authorization request to CDH, requesting

additional waste codes for certain units. Temporary authorization was granted on 12/12/91 and granted through 6/8/92. These additional codes are included in Modification #4 (see below).

- 12/23/91 DOE and EG&G Rocky Flats submit Permit Modification Request #3 to CDH, a Class I modification which removed an interim compliance date from the training section.
- DOE and EG&G Rocky Flats submit Permit Modification Request #4 to CDH, a Class II modification which added NDT counters and waste codes (see 12/10/91 above). Revision 3 of the combined Part A Permit Application is attached to this modification. Temporary authorization for the counters was requested and granted 4/16/92. Public comment meeting held 2/13/92.
- 1/28/92 DOE and EG&G Rocky Flats submit Permit Modification Request #5 to CDH, a Class III modification which rewrote the training section. Temporary authorization was requested and granted \_\_\_\_\_\_. Public comment meeting held 2/13/92.
- 2/3/92 DOE and EG&G Rocky Flats submit Combined Part A Application (Revision 2) to CDH. This application requests interim status for 38 new container storage areas and 35 new storage tanks for newly generated mixed residues.
- 2/25/92 DOE and EG&G Rocky Flats submit Permit Modification Request #6 to CDH, a Class I modification which reformatted Part III, Treatment and Storage Units, of the RCRA Permit.
- 2/27/92 DOE and EG&G Rocky Flats submits to EPA a RCRA Part B Permit Application supplement to address organic air emissions regulations.
- 3/20/92 DOE and EG&G Rocky Flats submit Permit Modification Request #7 to CDH, a Class I modification which reformatted the remaining parts of the RCRA Permit.
- 4/10/92 DOE and EG&G Rocky Flats withdraw Revision 2 to the Combined Part A Application.
- 5/19/92 EG&G Rocky Flats submits to DOE additional justification for previously requested changes to interim status EPA waste codes. This justification addresses changes originally requested in LL Mixed Waste Part A Permit Applications Revisions 7 and 8, TRU Mixed Waste Part A Permit Applications revisions 5 and 6, and the Combined Part A Permit Application revision 1. The additional justification was revised (based on DOE comments) and submitted on 6/29/92.
- 6/4/92 CDH approves change to interim status to allow treatment of TRU mixed waste in SARF and TWS. This request was submitted by DOE on 11/2/89.
- 6/17/92 CDH issues a Notice of Violation (NOV) to EG&G Rocky Flats through DOE.

  The NOV included 56 violations the majority of which appear to be attributable to inadequate RCRA training and failure to prioritize and complete corrective actions.

- 6/30/92 DOE and EG&G Rocky Fiats submit Permit Modification Request #8 to CDH, a Class III modification which added the Mixed Residues Units. Public comment meeting scheduled for 8/18/92.
- 7/8/92 EG&G Rocky Flats submit the revised Interim Status Contingency Plan to DOE. The Contingency Plan is placed in effect.
- 7/15/92 EG&G Rocky Flats submit Permit Modification Request #9 to DOE, a Class III modification which adds Phase I of the Building 374 Evaporator Upgrades. The upgrades include installing thin film evaporators and a new saltcrete cementation process.
- 7/20/92 DOE and EG&G Rocky Flats submit a request for temporary change to Interim status for Tent 1 (Unit 18.03) to allow pavement to be placed on Unit 10. CDH approves request on 7/22/92. The temporary change is effective from August 1st through October 31st.
- 7/22/92 CDH approves change to interim status to allow treatment of Low Level mixed waste in SARF and TWS.
- 7/23/92 EG&G Rocky Flats submits to DOE a request for change to interim status to address the new solidification process for the remaining solar pond sludge.